

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

QUORUM HEALTH CORPORATION,

Reorganized Debtor.

) Chapter 11

) Case No. 20-10766 (BLS)

) Jointly Administered

DANIEL H. GOLDEN, AS LITIGATION
TRUSTEE OF THE QHC LITIGATION
TRUST, AND WILMINGTON SAVINGS
FUND SOCIETY, FSB, SOLELY IN ITS
CAPACITY AS INDENTURE TRUSTEE

Plaintiffs,

v.

) Adv. Proc. No. 21-51190 (BLS)

COMMUNITY HEALTH SYSTEMS, INC.;
CHS/COMMUNITY HEALTH SYSTEMS,
INC.; REVENUE CYCLE SERVICE CENTER,
LLC; CHSPSC, LLC; PROFESSIONAL
ACCOUNT SERVICES, INC.; PHYSICIAN
PRACTICE SUPPORT, LLC; ELIGIBILITY
SCREENING SERVICES, LLC; W. LARRY
CASH; RACHEL SEIFERT; ADAM
FEINSTEIN; AND CREDIT SUISSE
SECURITIES (USA) LLC,

Defendants.

**JOINT REQUEST FOR ORAL ARGUMENT IN CONNECTION WITH
DEFENDANTS COMMUNITY HEALTH SYSTEMS, INC., W. LARRY CASH, AND
RACHEL SEIFERT'S MOTION TO STAY LITIGATION PENDING ARBITRATION**

Pursuant to Del. Bankr. L.R. 7007-3, (i) Defendants Community Health Systems, Inc., W. Larry Cash, and Rachel Seifert (collectively, the “Defendants”); and (ii) Quorum Health Corporation (“Quorum”), respectfully jointly request oral argument on Defendants’ Motion to Stay

Litigation Pending Arbitration [Docket Nos. 61] (the “Motion to Stay Litigation”) filed on March 7, 2022. The Motion to Stay Litigation is fully briefed and ready for the Court’s consideration.

Dated: May 16, 2022
Wilmington, Delaware

Respectfully submitted,

<p><u>/s/ Michael S. Neiburg</u> Michael S. Neiburg (DE No. 5275) Christopher M. Lambe (DE No. 6846) YOUNG CONAWAY STARGATT & TAYLOR LLP Rodney Square 1000 North King St. Wilmington, DE 19801 Tel.: (302) 571-6600 Fax: (302) 571-1253 mneiburg@ycst.com</p> <p><i>Counsel for Defendants Community Health Systems, Inc., W. Larry Cash, and Rachel Seifert,</i></p>	<p>Gary A. Orseck (admitted <i>pro hac vice</i>) Alison C. Barnes (admitted <i>pro hac vice</i>) William J. Trunk (admitted <i>pro hac vice</i>) Jack A. Herman (admitted <i>pro hac vice</i>) Lauren C. Andrews (admitted <i>pro hac vice</i>) Jason A. Shaffer (admitted <i>pro hac vice</i>) KRAMER LEVIN ROBBINS RUSSELL 2000 K Street, N.W., 4th Floor Washington, D.C. 20006 Tel: (202) 775-4500 Fax: (202) 775-4510 gorseck@kramerlevin.com</p> <p><i>Counsel for Defendants Community Health Systems, Inc., W. Larry Cash, and Rachel Seifert</i></p>
<p><u>/s/ Marcy J. McLaughlin Smith</u> David M. Fournier (DE No. 2812) Marcy J. McLaughlin Smith (DE No. 6184) Kenneth A. Listwak (DE No. 6300) TROUTMAN PEPPER HAMILTON SANDERS LLP Hercules Plaza, Suite 5100 1313 N. Market Street, P.O. Box 1709 Wilmington, Delaware 19899-1709 Telephone: (302) 777-6500 Facsimile: (302) 421-8390 E-mail: david.fournier@troutman.com kenneth.listwak@troutman.com marcy.smith@troutman.com</p> <p><i>Attorneys for Quorum Health Corporation</i></p>	<p>H. Peter Haveles, Jr. (admitted <i>pro hac vice</i>) AKERMAN LLP 1251 Avenue of the Americas, 37th Floor New York, New York 10020 Telephone: (212) 822-2280 Facsimile: (212) 259-8586 E-mail: peter.haveles@akerman.com</p> <p><i>Attorneys for Quorum Health Corporation</i></p>